

# SECRET

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

**JORDAN C. MOSTROM,**  
[DOB: 05-18-1999]

Defendant.

No. 22-03024-01-CR-S-BCW

**COUNT 1**

18 U.S.C. §§ 922(g)(3) and 924(a)(2)  
NMT 10 Years Imprisonment  
NMT \$250,000 Fine  
NMT 3 Years Supervised Release  
Class C Felony

**COUNTS 2 AND 3**

18 U.S.C. §§ 922(a)(6) and 924(a)(2)  
NMT 10 Years Imprisonment  
NMT \$250,000 Fine  
NMT 3 Years Supervised Release  
Class C Felony

**Forfeiture Allegation**

\$100 Special Assessment (Each Count)

**INDICTMENT**

**THE GRAND JURY CHARGES THAT:**

**COUNT 1**

(Possession of Firearm by Prohibited Person)  
18 U.S.C. §§ 922(g)(3) and 924(a)(2)

On or about March 2, 2021, in Greene County, in the Western District of Missouri, the defendant, **JORDAN C. MOSTROM**, then knowing he was an unlawful user of a controlled substance as defined in Title 21, United States Code, Section 802, knowingly possessed a firearm, to wit, a Taurus, model G2c, 9mm semi-automatic pistol, bearing serial number 1C006634, and the firearm was in and affecting interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

**COUNT 2**  
(Making a False Statement During a Firearm Purchase)  
18 U.S.C. §§ 922(a)(6) and 924(a)(2)

On or about March 6, 2021, in Greene County, in the Western District of Missouri, the defendant, **JORDAN C. MOSTROM**, in connection with the acquisition of a firearm, that is, a Taurus, model G3c, 9mm semi-automatic pistol, bearing serial number ABN389159, from Patak-Phillips Fine Arms located in Shell Knob, Barry County, Missouri, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, which was operating at a qualifying gun show or event in Springfield, Greene County, Missouri, knowingly made a false and fictitious written statement to Patak-Phillips Fine Arms, which statement was intended and likely to deceive Patak-Phillips Fine Arms as to a fact material to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, stating that he was not an unlawful user of a controlled substance, whereas, in truth, he was; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

**COUNT 3**  
(Making a False Statement During a Firearm Purchase)  
18 U.S.C. §§ 922(a)(6) and 924(a)(2)

On or about April 8, 2021, in Greene County, in the Western District of Missouri, the defendant, **JORDAN C. MOSTROM**, in connection with the acquisition of a firearm from Armed Sources Gun and Pawn located in Springfield, Greene County, Missouri, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Armed Sources Gun and Pawn, which statement was intended and likely to deceive Armed Sources Gun and Pawn as to a fact material to the lawfulness of such

sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, stating that he was not an unlawful user of a controlled substance, whereas, in truth, he was; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

### **FORFEITURE ALLEGATION**

The allegations contained in Count 1 of this Indictment are re-alleged and incorporated by reference as though set forth fully here in for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

Upon conviction of the offense set forth in Count 1 of this Indictment, the defendant, **JORDAN C. MOSTROM**, shall forfeit to the United States any firearms and ammunition involved or used in the commission of the offenses, including, but not limited to, a Taurus, model G2c, 9mm semi-automatic pistol, bearing serial number 1C006634.

All pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

### **A TRUE BILL**

/s/ Jeffrey Acker

**FOREPERSON OF THE GRAND JURY**

/s/ Jessica R. Sarff

**JESSICA R. SARFF**

Assistant United States Attorney

DATED: 2/22/2022

Springfield, Missouri